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July 15, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: Allocation of Spectrum for Windprofiler Radar
Systems
PR Docket No. 93-59

Dear Mr. Caton:

Transmitted herewith on behalf of Mark IV Industries, Ltd.,
I.V.H.S. Division are an original and nine copies of its reply
comments in response to the Commission's Notice of Proposed
Rulemaking and Notice of Inquiry in the above-referenced docket.

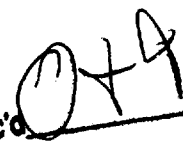
In the event there are any questions concerning this matter,
please communicate with the undersigned.

Very truly yours,


George Y. Wheeler

Enclosures

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AVM NPRM.** The 12.5 MHz bandwidth at 915 MHz proposed by Radian encompasses the 912-918 MHz portion of the AVM/AVI band and significant portions of the 904-912/918-926 MHz bands also expected to be used for AVM/AVI operations. The potentially destructive impact of wind profiler caused interference to co-channel AVM/AVI operations could cripple the deployment of new AVM/AVI technologies.

Many commentors in this proceeding (and in the AVM NPRM), have confirmed that the 902-928 MHz band will be used for new and innovative technologies including AVM/AVI and Part 15 unlicensed systems to meet substantial and growing public needs. One of the most serious issues in the AVM NPRM proceeding is how the 902-928 MHz band can be configured to permit spectrum efficient uses by these numerous Part 90 licensed AVM/AVI and Part 15 unlicensed operations. Before adding yet another contender for spectrum usage rights, such as for wind profiler systems, the Commission should resolve the competing claims being made in its AVM NPRM proceeding.


We join with the other commenters who have requested that the Commission hold in abeyance its deliberations regarding Radian's proposals (1) to permit additional information to be developed regarding the interference issues surrounding wind profiler operations and (2) to permit resolution of the complex

**Notice of Proposed Rulemaking in PR Docket No. 93-61 released April 9, 1993 ("AVM NPRM").

and conflicting claims of users already authorized in the 902-928 MHz band before addressing Radian's proposals.

Respectfully submitted,

**MARK IV INDUSTRIES, LTD.,
I.V.H.S. DIVISION**

By  /s/ George Y. Wheeler
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July 15, 1993

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CERTIFICATE OF SERVICE

I, Abbie Weiner, a secretary in the law firm of Koteen & Naftalin, do hereby certify that a copy of the foregoing "Reply Comments of Mark IV Industries, Ltd., I.V.H.S. Division was sent by first class U.S. mail, postage prepaid, on this 15th day of July, 1993 to the offices of the following:

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